

1 Jerry L. Marks (SBN 135395)
2 Email: jmarks@milbank.com
3 Aaron Renenger (SBN 222675)
4 Email: arenenger@milbank.com
5 MILBANK, TWEED, HADLEY & McCLOY LLP
6 601 S. Figueroa Street, 30th Floor
7 Los Angeles, California 90017
8 Telephone: (213) 892-4000
9 Facsimile: (213) 629-5063

7 David R. Gelfand (*admitted pro hac vice*)
8 Email: dgelfand@milbank.com
9 Rachel Penski Fissell (*admitted pro hac vice*)
10 Email: rfissell@milbank.com
11 MILBANK, TWEED, HADLEY & McCLOY LLP
12 1 Chase Manhattan Plaza
13 New York, NY 10005
14 Telephone: (212) 530-5000
15 Facsimile: (212) 822-5661
16 *Attorneys for Defendants STA Development, LLC,*
17 *Solar Trust of America, LLC, Solar Millennium, Inc.,*
18 *CA I-10 Solar, LLC, Palo Verde Solar I, LLC,*
19 *Palo Verde Solar II, LLC, Blythe Solar Power Project*
20 *Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,*
21 *Blythe Solar Power Project Unit 3, LLC and*
22 *Blythe Solar Power Project Unit 4, LLC*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

19 MMR GROUP, INC.,
20 MMR POWER SOLUTIONS, LLC and
21 SOUTHWESTERN POWER GROUP II, LLC,
22 Plaintiffs,

23 vs.

23 STA DEVELOPMENT, LLC (F/K/A SOLAR
24 MILLENNIUM, LLC), SOLAR TRUST OF
25 AMERICA, LLC, SOLAR MILLENNIUM AG,
26 SOLAR MILLENNIUM, INC., CA I-10 SOLAR, LLC,
27 PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR
28 II, LLC, BLYTHE SOLAR POWER PROJECT UNIT 1,
LLC, BLYTHE SOLAR POWER PROJECT UNIT 2,
LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC
AND BLYTHE SOLAR POWER PROJECT UNIT 4, LLC
Defendants.

Case No. 3:11-cv-01521-EMC

**ELEVENTH STIPULATION
TO EXTEND DEFENDANTS'
TIME TO RESPOND TO
AMENDED COMPLAINT
AND [PROPOSED] ORDER**

**The Honorable Judge
Edward M. Chen**

1 Plaintiffs MMR GROUP, INC., MMR POWER SOLUTIONS, LLC and
2 SOUTHWESTERN POWER GROUP II, LLC (collectively, "MMR") and Defendants STA
3 DEVELOPMENT, LLC, SOLAR TRUST OF AMERICA, LLC, SOLAR MILLENNIUM, INC.,
4 CA I-10 SOLAR, LLC, PALO VERDE SOLAR I, LLC, PALO VERDE SOLAR II, LLC,
5 BLYTHE SOLAR POWER PROJECT UNIT 1, LLC, BLYTHE SOLAR POWER PROJECT
6 UNIT 2, LLC, BLYTHE SOLAR POWER PROJECT UNIT 3, LLC AND BLYTHE SOLAR
7 POWER PROJECT UNIT 4, LLC (collectively, the "STAD Defendants") respectfully request
8 that the Court extend the time for the STAD Defendants to respond to the Amended Complaint,
9 filed on October 4, 2011 (ECF No. 102) and served on the STAD Defendants on October 7, 2011,
10 by two weeks from March 6, 2012 to March 13, 2012.
11

12 On November 4th and 14th, the parties requested, and this Court later granted, a one-week
13 extension of time for the STAD Defendants to respond to the Amended Complaint because the
14 parties were in advanced stages of settlement discussions. On November 22nd, December 1st, and
15 December 27th, January 10th, January 20th, February 3rd, and February 21st, the parties requested,
16 and this Court later granted, extensions of two weeks due to continued progress in settlement
17 negotiations. The parties continue to be hopeful that they will execute a settlement agreement
18 forthwith. Due to the continued progress in reaching a settlement, the parties request a one-week
19 extension of the time for the STAD Defendants to respond to the Amended Complaint. The
20 parties' request will have a *de minimis*, if any, impact on the schedule. In the interests of judicial
21 economy, the parties therefore request that the Court extend the STAD Defendants' time to
22 respond to the Amended Complaint by two weeks from March 6, 2012 to March 13, 2012.
23
24
25
26
27
28

1 Dated: March 5, 2012

MILBANK, TWEED, HADLEY & McCLOY LLP

2 By: /s/

3 Jerry L. Marks (SBN 135395)
4 Aaron Renenger (SBN 222675)
5 601 S. Figueroa Street, 30th Floor
6 Los Angeles, California 90017
7 Telephone: (213) 892-4000
8 Facsimile: (213) 629-5063

9 David R. Gelfand (*admitted pro hac vice*)
10 Rachel Penski Fissell (*admitted pro hac vice*)
11 1 Chase Manhattan Plaza
12 New York, NY 10005
13 Telephone: (212) 530-5000
14 Facsimile: (212) 822-5661

15 *Attorneys for Defendants STA Development, LLC,*
16 *Solar Trust of America, LLC, Solar Millennium, Inc.,*
17 *CA I-10 Solar, LLC, Palo Verde Solar I, LLC,*
18 *Palo Verde Solar II, LLC, Blythe Solar Power Project*
19 *Unit 1, LLC, Blythe Solar Power Project Unit 2, LLC,*
20 *Blythe Solar Power Project Unit 3, LLC and Blythe Solar*
21 *Power Project Unit 4, LLC*

22 Dated: March 5, 2012

WATT, TIEDER, HOFFAR & FITZGERALD, LLP

23 By: /s/

24 Bennett J. Lee (CA Bar No. 230482)
25 Nicholas A. Merrell (CA Bar No. 240795)
26 Regina A. Verducci (CA Bar No. 264996)
27 333 Bush Street, Suite 1500
28 San Francisco, CA 94104
Telephone: 415-623-7000
Facsimile: 415-623-7001

Attorneys for Plaintiffs MMR Group, Inc., MMR Power
Solutions, LLC and Southwestern Power Group II, LLC

29 PURSUANT TO STIPULATION, IT IS SO ORDERED.

30 Dated: _____

UNITED STATES DISTRICT JUDGE